

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

John K Ellis and Candice R Ellis

Debtors.

Case No. 18-10405
Chapter 13

TRUSTEE'S OBJECTION TO PROPOSED MODIFICATION

Andrea E. Celli, Trustee hereby objects to the proposed Modified Plan on the basis that it does not meet the requirements of 11 U.S.C. 1329(b).

LIQUIDATION: Modified Plan does not provide unsecured creditors with at least as much as they would have received under a Chapter 7 liquidation pursuant to 11 U.S.C. 1325(a)(4).

-Need status of gender discrimination claim/cause of action discussed at filing.

Dated: February 14, 2024

/s/ Andrea E. Celli

Andrea E. Celli, Trustee
7 Southwoods Blvd.
Albany, NY 12211

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CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that the foregoing is true and correct:

1. I am not a party to the action and am over 18 years of age.
2. On this date, I caused a true copy of Trustee's Objection to Modification to be served on the following individuals via electronic means:

Office of the U.S. Trustee

Elizabeth Fairbanks Fletcher, Esq.

3. On this date, I served a true copy of Trustee's Objection to Modification by mailing the same in a sealed envelope, via **first class mail**, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service within the State of New York to the following parties:

John K Ellis
Candice R Ellis
2 Callagan Drive
Saratoga Springs, NY 12866

Executed on: FEBRUARY 14, 2024

/s/ Kim Waxman

Kim Waxman
Office of Andrea E. Celli
Chapter 13 Standing Trustee
7 Southwoods Boulevard
Albany, NY 12211